

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CHAPTER 13**  
**ANDREW CHARLES HOY** :  
**Debtor** : **CASE NO. 1:24-bk-02639**  
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**MOTION TO EXTEND AUTOMATIC STAY AND**  
**REQUEST FOR EXPEDITED HEARING**

COMES NOW the Debtor, by and through Mott & Gendron Law, and moves to extend the automatic stay beyond the 30 days provided for under 362(c)(3) and to continue the stay until the closing of the case, respectfully stating in support thereof as follows:

1. The Debtor filed a Chapter 13 Bankruptcy Petition on October 15, 2024.
2. The Debtor had a prior case pending, which was dismissed within the past year.
3. The Debtor had a substantial change because his wife is now earning income as a photographer and his wages have increased.
4. The Debtor believes that he will be able to succeed in this reorganization.
5. Pursuant to 362(c)(3)(B), upon motion by a party in interest, the Court may extend the stay as to all creditors.
6. The Debtor also requests that the Court schedule a hearing on an expedited basis, as the Court may believe that a hearing on this issue must be held within 30 days of the date that the petition was filed.

WHEREFORE, the Debtor requests that the Court extend the automatic stay as to all creditors until the case is closed.

Respectfully submitted,

/s/ Dorothy L. Mott

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**ORDER**

UPON CONSIDERATION of the Motion to Extend the Automatic Stay, and cause appearing therefore, it is hereby

ORDERED AND DECREED that automatic stay remains unaffected as to property of the estate and thus the stay continues to protect property of the estate until the closing of the case or further order of the Court; and

IT IS FURTHER ORDERED AND DECREED that pursuant to the Debtor's motion, the automatic stay as to the debtor and the debtor's property shall continue until the closing of the case or further order of the Court.

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**AFFIDAVIT OF CHANGED CIRCUMSTANCES**

I, the undersigned, represent as follows:

1. My name is Andrew Charles Hoy and my current address is 21 Clover Lane Halifax, PA 17032 .
2. I filed a Voluntary Petition in Bankruptcy at the above-captioned docket.
3. I filed a prior bankruptcy which was dismissed within the preceding year.
4. My last bankruptcy was dismissed because I did not make the plan payments.
5. There has been a substantial change in circumstances, because my wife now has income as a photographer and my income has increased.
6. I believe I will be able to succeed in this bankruptcy filing.

I swear under penalty of perjury that the foregoing information is true and correct to the best of my knowledge and belief.

**/s/ Andrew Charles Hoy**